



TOWN OF EASTON

DEPARTMENT OF PUBLIC WORKS

417 Bay Road

Easton, Massachusetts 02375-1416

Tel: (508) 230-0850

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April 28, 2004

United States Department of Environmental Protection
Water Technical Unit
P.O. Box 8127
Boston, MA 02114

RE: EPA Phase II Storm Water Annual Report – Easton, Massachusetts

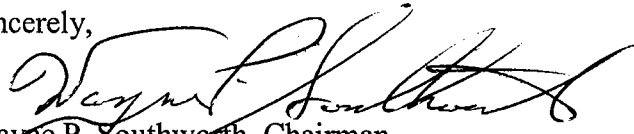
Gentlemen:

This letter constitutes the town of Easton's EPA Phase II Storm Water Annual Report as follows:

- a. Compliance with the permit – Full compliance with the conditions of the permit were met during this reporting period.
- b. Appropriateness of the selected BMP's – All BMP's selected and performed during this reporting period were appropriate and effective.
- c. Progress towards achieving the measurable goals - All goals programmed for the Summer 2003 to the Spring 2004 were met at least once during this reporting period.
- d. A summary of results and data collected to date - Appendix "A" contains a progress report towards achieving measurable goals for the period Summer 2003 to Spring 2004.
- e. Discussion of activities for the next reporting period - Appendix "B" contains a discussion of activities programmed for the next reporting period.
- f. Discussion of any changes in identified BMP's or measurable goals - Appendix "C" contains changes to identified BMP's or measurable goals which has been submitted to the EPA for approval.
- g. Reliance on another entity for achieving any measurable goal - There is no reliance on another entity for achieving any of Easton's measurable goals.

Should you have any additional questions on this matter, please contact me.

Sincerely,


Wayne P. Southworth, Chairman
Easton Storm Water Committee

CC: Massachusetts Department of Environmental Protection
Division of Watershed Management
627 Main Street
Worcester, MA 01608

2004 APR 30 10:18

APPENDIX A
PROGRESS REPORT TOWARDS ACHIEVING MEASURABLE GOALS
(SUMMER 03 TO WINTER 03/04)

Summer - 03

1A – Educational Materials: In July 2003, educational training which included storm water management was given at a girls science camp at Borderland State Park by an Easton Water Division staff member.

5A – Enforcing Existing Regulations: This is an on-going activity by our Planning & Zoning Board (P&ZB), Conservation Commission (Con Com), and Building Inspection Department as part of their normal routine.

5B - Multi-departmental Reviews: All projects including site plans and subdivisions routinely undergo multi-departmental reviews that includes erosion and sediment control issues.

Fall - 03

1A - Educational Materials: During the month of September 2003, 13 sessions of educational training which included storm water management was given to 6th grade classes by an Easton Water Division staff member.

1B – Coordination with Others: The Natural Resources Trust (NRT) was contacted in November 2003 and they agreed to also emphasize the importance of keeping our waters clean while conducting their annual 6th grader field trip to local watersheds.

1C – Use of Media: A newspaper article “Keeping vigil over water supplies, Storm Water Management Program Taking Shape” written by the Chairman, Storm Water Advisory Committee, was published in the November 2003 issue of the Easton Journal newspaper.

5A – Enforcing Existing Regulations: This is an on-going activity by our P&ZB, Con Com, and Building Inspection Department as part of their normal routine.

5B - Multi-departmental Reviews: All projects including site plans and subdivisions routinely undergo multi-departmental reviews that includes erosion and sediment control issues.

Winter – 03/04

1A - Educational Materials: A flyer entitled “Town of Easton, Comprehensive Wastewater Management Plan” which stresses the need for a sewerage system to prevent contaminating our surface waters and groundwater was put on display at the Water Division Office in December 2003 and is offered as a handout. In addition, during the month of January 2004, a girl scout group was educated in storm water management by an Easton Water Division staff member. The educational session was repeated in February 2004 to a Brownie group.

1B - Coordination with Others: A meeting was held between the Chairman, Storm Water Advisory Committee and the Town Administrator in February 2004 to prepare a storm water management briefing for the Board of Selectmen. The meeting also discussed highlights of the storm water management program which should be covered by the Planning and Zoning Board when they conduct their public hearings on

the recommended new storm water management Zoning By-laws, and modifications to the Subdivision Rules and Regulations to include erosion and sediment control.

2A - Public Hearings: The P&ZB prepared for public hearings for Storm Water Management additions to the Zoning By-Laws and revisions to the Subdivision Rules and Regulations to be compliant with Storm Water Management provisions.

2B - Local Interest Groups: The intent of storm water management was promoted to local interest groups as follows:

Canoe River Aquifer Advisory Committee by the DPW Director

Water Advisory Board by the Water Superintendent

Municipal Building Committee by the DPW Director

Wastewater Committee by the DPW Director

Southeast Regional Services Group by the Highway Superintendent

3B - Modify Existing Regulations: Modifications were made to the Subdivision Rules and Regulations to be compliant with the provisions of Storm Water Management.

4A - Erosion/Sediment By-laws: A new section to the Zoning By-laws were made to address erosion and sediment control issues.

4B - Sanctions: The new Storm Water Management section to the Zoning By-laws includes sanctions for violations to the By-laws.

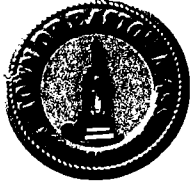
4C - BMP's for Erosion and Sediment Control Laws: The new Storm Water Management section to the Zoning By-Laws requires that BMP's for erosion and sediment control are addressed as part of the permitting process.

5A - Enforcing Existing Regulations: This is an on-going activity by our P&ZB, Con Com, and Building Inspection Department as part of their normal routine.

5B - Multi-departmental Reviews: All projects including site plans and subdivisions routinely undergo multi-departmental reviews that includes erosion and sediment control issues.

5C - Operation & Maintenance of BMP's: The new Storm Water Management section to the Zoning By-Laws requires O&M of BMP's as part of the permitting process.

6A - Develop/Implement/Enforce Good Housekeeping: At a monthly DPW training meeting, a video on Storm Water Management was shown to the staff which included the benefits of good housekeeping.



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April 28, 2004

United States Department of Environmental Protection
Water Technical Unit
P.O. Box 8127
Boston, MA 02114

RE: EPA Phase II - Easton, Massachusetts
Change to SWMP

Gentlemen:

It is hereby requested that approval be given to change the following BMP or measurable goal contained in its Storm Water Management Plan.

BMP 1D – Catch Basin Stenciling: Scheduled for Summer of 05, 06, 07 to be replaced by establishment of a new BMP 2D – “Watch Dog Group” to be initiated during the Fall 04.

Catch basin stenciling was scheduled to start in the Summer of 05 to serve as a reminder to the populace of the environmental consequences of dumping materials directly and indirectly into the storm sewer system. Stencils painted on or near inlets to the storm sewer system would discourage improper dumping and bring attention to the fact that materials entering the storm sewer system ultimately enter our receiving waters without treatment.

This BMP is considered infeasible for safety, liability, and economical reasons. It was originally intended to use volunteers to stencil catch basins because of the lack of available DPW staff members to accomplish this task. Any catch basin stenciling activities requires the use of traffic cones, and DPW or Police presence. The safety of Stencilers cannot be assured because of the lack of DPW personnel to protect Stencilers from traffic. Should an accident befall any residents performing stenciling tasks, the town would be open to liability issues which alone would preclude the use of residents to stencil catch basins as originally planned.

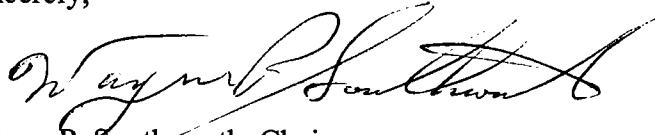
As a replacement to catch basin stenciling, it is considered equally effective if a “Watch Dog Group” among residents were established whose primary purpose would be to report illegal dumping into catch basins. It is felt that illegal dumping into catch basins does not occur on a frequent enough basis to warrant the expense and liability of stenciling Easton’s catch basins.

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The new BMP is expected to achieve the goals of the BPM to be replaced because it is felt that establishment of a Watch Dog Group would be far more effective as a deterrent to illegal dumping into catch basins than a stenciled catch basin saying "Don't Dump".

If any additional information is needed on this request for change, please contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Wayne P. Southworth". The signature is fluid and cursive, with a large, stylized initial "W".

Wayne P. Southworth, Chairman
Storm Water Management Committee

CC: Massachusetts Department of Environmental Protection
 Division of Watershed Management
 627 Main Street
 Worcester, MA 01608

APPENDIX B
ACTIVITIES FOR NEXT REPORTING PERIOD
(SPRING 04 TO WINTER 04/05)

Spring 04 to Winter 04/05

1 A. Storm Water Educational Materials:

As part of Easton's public education program during this period the Storm Water Advisory Committee will continue to develop and distribute storm water educational materials, coordinate with schools and local service groups, and use the media as appropriate to promote the intent of storm water management. This Storm Water Management Plan (SWMP) includes an education and outreach program, designed to inform the general populace who live and work in Easton about storm water pollution, its causes and effects, and what they can do to reduce the impact of storm water pollution on the environment.

The educational materials will include posters and/or pamphlets developed locally or obtained from the State and EPA. The posters will be designed to "get the message out" about keeping our waters clean and interconnections between our Municipal Separate Storm Sewer System (MS4) and receiving waters. These flyers will be mailed out to residents, posted, handed out in public buildings such as the library, town hall, schools, etc., revised as needed, distributed at public events, and made available to interested environmental groups for use in their own educational activities.

The educational material(s) will be developed and distributed periodically throughout the permit term by the Storm Water Advisory Committee to explain how it is in everybody's interest to keep our waters clean of contaminants. The materials will point out to residents preventative measures such issues as home automotive care, yard care, littering and illegal dumping prevention, proper maintenance of septic systems, proper disposal of hazardous wastes, trash management, disposal of pet wastes ("pooper scoopers"), etc. In addition, commercial, industrial, institutional and municipal entities will be made aware of the importance of the cleaning of grease traps, proper disposal of used motor oils in garages, and reminders of wellhead protection requirements.

Spring 04, Fall 04 and Winter 04/05

1 B. Coordination with Schools and Local Service Groups:

Easton's Storm Water Management Program efforts will be enhanced by coordinating its program with the School Department, regional and local service groups such as the Canoe River Aquifer Advisory Committee, the Natural Resources Trust, and public service groups such as the Chamber of Commerce, Knights of Columbus, Rotary Club, Masons, etc.

School Department - The School Department through its students and their parents are expected to be instrumental in getting the word out about cleaning up

our waters. Through the schools, yearly poster contests will be conducted similar to those presently being conducted for conserving water. In addition, the schools will be encouraged to preach storm water issues in their classrooms.

Canoe River Aquifer Advisory Committee - The Canoe River Aquifer Advisory Committee was created in 1987 to educate the public about the need to protect the Canoe River Aquifer which is a sole source aquifer supplying water to the towns of Easton, Foxborough, Mansfield, Norton, and Sharon. This committee has been very successful in its quest to protect the Canoe River Aquifer and will serve as a valuable resource to Easton's Storm Water Management Program. Their experience in "getting the word out", and enlisting public participation will be an invaluable asset as well as helping to implement a regional program.

Natural Resources Trust – The Storm Water Advisory Committee will contact the Natural Resources Trust (NRT) to see if they will consider expanding its environmental studies class to include the issues of storm water discharges on our water courses.

Public Service Groups - Public service groups such as Chamber of Commerce, Knights of Columbus, Rotary Club, and Masons will be contacted to assist in promoting Easton's Storm Water Management Program, and also to assist in recruiting residents for a "Watch Dog Group", and stream clean-up days.

Spring 04 and Fall 04

1 C. Use of the Media:

The local media will be utilized to promote Easton's Storm Water Management Program in educating residents on the benefits of proper septic system maintenance and other individual efforts that will help keep our waters clean. The Storm Water Advisory Committee will provide routine press releases to the media through the Brockton Enterprise, and the Easton Journal. Public service videos of why we need clean waters, will be developed and shown periodically in the local cable TV station. Further information and links to supporting State Board of Health programs will be available through Easton's Web Site, and exhibits at the annual Water Division Open House are planned which will further benefit the outreach/education for residents in cleaning up our waters.

Spring 04

2 A. Public Hearings:

Public participation is an important ingredient to a successful storm water management program. In order to provide the public the opportunity to participate in the development, implementation, and review of Easton's storm water management program, public hearings will be held.

The Planning and Zoning Board in behalf of the Storm Water Advisory Committee will hold public hearings on a proposed new Storm Water Management section addition to the Zoning By-laws and additions to

Easton's Subdivision Rules & Regulations to include erosion and sediment control. At that time the populace will have the opportunity to voice their support to the program and also contribute ideas to make the program more effective. The public will have the opportunity for additional input on the storm water program at the annual town meeting when the public will take an active part in the passage of additions to the Zoning By-laws and changes to the Subdivision Rules & Regulations.

Spring 04 and Winter 04/05

2 B. Local Interest Groups:

Public participation will also be accomplished by meeting with and offering power point presentations to local interest groups in an effort to enlist volunteers to perform stream monitoring, reporting illicit discharges, etc. Participation by residents will also be encouraged through Easton's web site for suggestions to make Easton's storm water program more effective.

Summer 04

2 C. Stream Clean-up Days:

Through school programs, local organizations, and boy and girl scout groups etc., with the assistance of DPW forces and equipment, stream clean-up days will be arranged yearly to remove trash, and litter from our streams. These efforts along with timely publicity will keep the task of "keeping our streams clean" to the forefront.

Winter 04/05

3 A. Drainage System Map:

While many BMP's serve only to reduce pollutant loading, illicit detection and removal completely eliminates a pollution source. The detection of illicit connections is generally done in three steps, namely, locating the problem area(s), isolating the source(s) of the problem, and making the owner(s) correct the problem. Key ingredients of a successful illicit discharge detection and elimination program requires a drainage system map, modifying existing regulations to include storm water management requirements, and seeking volunteers to assist in identifying illicit discharges by forming a "Watch Dog Group".

In order to develop, implement, and enforce a program to detect and eliminate illicit discharges the DPW will first develop a road conduit and outfall map from plans on file. The sizes of all conduits and outfalls will be listed and their locations shown on the plans. A map of the drainage systems associated with each outfall will be prepared from DPW files following development of the outfall map.

Spring 04

3 B. Modifying Existing Regulations:

Prior to developing new Phase II ordinances and enforcement procedures, existing Board of Health, Building Inspection, Planning and Zoning Board, and Conservation Commission By-Laws and Rules and Regulations will be reviewed by the Storm Water Advisory Committee and modified as needed to conform with storm water management requirements.

4 A. Erosion and Sediment Control By-laws:

By-laws are needed to develop, implement, and enforce a program to address storm water runoff from erosion and sedimentation caused by construction activities which disturb more than 1-acre of land. An erosion and sediment control by-law will be brought before a town meeting for approval. The by-laws will require erosion and sediment control measures and sanctions to assure compliance.

4 B. Sanctions:

Sanctions are needed to ensure compliance with the Storm Water Management Program. Sanctions in the form of fines and/or permit denial will be assessed in the event agreed to erosion and sediment BMP's are not exercised at construction sites.

4 C. BMP's to Control Erosion and Sedimentation:

BMP's are needed to eliminate erosion and sediment discharges to our streams. Contractors will be reminded that a NPDES permit must be obtained from the EPA to include BMP's to control erosion and sediment during construction. A pre-construction review of the BMP designs will be conducted, as well as inspections of the BMP's during construction to verify that the BMP's are built as designed.

Summer 04 to Winter 04/05

4 D. Control of Construction Wastes:

Control of construction wastes such as discarding building materials, concrete truck wash-outs, chemicals, liter, and sanitary wastes would be handled by continued enforcement of Building Department code requirements for disposal of construction debris, continued enforcement of Board of Health code requirements for disposal of household and construction worker sanitary wastes, and continued enforcement of Water Division requirements prohibiting pumping from surface waters.

4 F. Procedures for Inspections and Enforcement:

Procedures will be developed for inspections and enforcement of control measures at construction sites. Inspections and enforcements will be accomplished by site visits by the Building Inspector, Board of Health, Conservation Agent, Highway Division, Town Planner, Water Division and Fire Prevention Officer on a regular basis to insure compliance.

Spring 04

4 E. Information Submitted by the Public of Violations:

A “hot line” will be established for the public to utilize in the event they witness any erosion and sedimentation violations at construction sites. Once a message is received, it will be promptly investigated by a member of the Storm Water Advisory Committee.

Spring 04 to Winter 04/05

5 A. Enforcement of Existing Regulations:

Control of post construction runoff from new and redevelopment projects that disturb more than one-acre will be accomplished by enforcing Federal, State, and Local regulatory requirements against contaminating water courses such as Wetlands Protection, Subdivision Rules and Regulations, Federal NPDES Permit, and Massachusetts Storm Water Management Policy.

Wetlands Protection: Presently, any construction activity that takes place on or near wetlands is strictly regulated by a number of different agencies, including the Easton’s Conservation Commission, Massachusetts Department of Environmental Protection (DEP), and in some cases, the Massachusetts Environmental Policy Act (MEPA). Projects falling under the scrutiny of these agencies will be required to comply with strict procedures for controlling future storm water pollution.

Subdivision Rules and Regulations: Easton’s Subdivision Rules and Regulations currently require subdivision plans to address site drainage and detention/retention basins, however, the Rules and Regulations will be expanded to include temporary erosion and sediment control measures to be implemented during construction and include adequate long term operation and maintenance of BMP’s to control erosion and sedimentation via storage, filtration, basins and trenches, etc. at construction sites. Any new rules and regulations will ensure that the controls that are in place will prevent or minimize impacts to water quality

Federal NPDES Permit: The Federal NPDES program with implementation of Phase II of the program sets the threshold for industrial activities to disturbance of one acre of land. In addition, all towns less than 100,000 population will also be covered under Phase II regulations and be required to develop Storm Water Management Plans requiring an application for a NPDES storm water discharge permit.

Massachusetts Storm Water Management Policy: The goal of the Massachusetts Storm Water Management Policy is to control peak discharges and improve water quality by implementation of

performance standards. The standards are applied during routine project review of new development and redevelopment that fall under the jurisdiction of the Wetlands Protection Act. They apply to industrial, commercial, institutional, residential subdivision, and roadway projects. The standards require control of peak flows rates and use of BMP's to reduce pollutant loads to specified levels.

5 B. Multi-Departmental Reviews:

Multi-departmental review of site plans and subdivisions will incorporate effects on potential water quality impacts including procedures for pre-construction review. In addition, the Aquifer Protection District will be updated to include the Zone 2 for Well #6.

Spring 04

5 C. Developing Operation and Maintenance of BMP's:

Erosion controls provide the first line of defense in preventing off-site sedimentation and are designed to prevent erosion through protection and preservation of soil. Sediment controls are designed to remove sediment from runoff before the runoff is discharged from the site. Sediment and erosion controls can be further divided into two major classes of controls: stabilization practices and structural practices. Erosion and sediment controls can become ineffective if they are damaged or not properly maintained. Therefore, developing long term operation and maintenance of BMP's is paramount to keeping our waters clean. If site inspections identify BMP's that are not operating effectively, maintenance must be accomplished before the next anticipated storm event. In addition, sediment from sediment traps or sediment ponds should be removed when the design capacity of that BMP has been reduced by 50 percent or more.

Spring 04 to Winter 04/05

6 B. Good Housekeeping:

DPW good housekeeping includes maintenance activities for, salt and sand storage, fleet and building, parks and open space, new construction and land disturbance, hazardous waste management, street sweeping and sanding operations, and catch basin cleaning.

Salt and Sand Storage – Salt and sand storage facilities should be inspected regularly to assure that they are covered adequately and properly.

Fleet and Building – Fleet and building maintenance requires containment from fleet maintenance and washing in accordance with the Wellhead Protection By-laws, and proper disposal of used oils and grease.

Parks and Open Space – Parks and open space maintenance activities include proper disposal of grass and leaves, and the use of pesticides, herbicides, and fertilizers.

APPENDIX C
CHANGES TO IDENTIFIED BMP's
OR MEASURABLE GOALS

BMP 1D – Catch Basin Stenciling: Scheduled for Summer of 05, 06, 07 to be replaced by establishment of a new BMP 2D – “Watch Dog Group” to be initiated during the Fall 04

- 1 D. Catch Basin Stenciling: Catch basin stenciling was scheduled to start in the Summer of 05 to serve as a reminder to the populace of the environmental consequences of dumping materials directly and indirectly into the storm sewer system. Stencils painted on or near inlets to the storm sewer system would discourage improper dumping and bring attention to the fact that materials entering the storm sewer system ultimately enter our receiving waters without treatment.

Why the BMP is infeasible:

This BMP is considered infeasible for safety, liability, and economical reasons. It was originally intended to use volunteers to stencil catch basins because of the lack of available DPW staff members to accomplish this task. Any catch basin stenciling activities requires the use of traffic cones, and DPW or Police presence. The safety of Stencilers cannot be assured because of the lack of DPW personnel to protect stencilers from traffic. Should an accident befall any residents performing stenciling tasks, the town would be open to liability issues which alone would preclude the use of residents to stencil catch basins as originally planned.

Effectiveness of replacement BPM:

As a replacement to catch basin stenciling, it is preferred to establish a “Watch Dog Group” among residents whose primary purpose would be to report illegal dumping into catch basins. It is felt that illegal dumping into catch basins does not occur on a frequent enough basis to warrant the expense and liability of stenciling Easton’s catch basins.

Why the replacement BPM is expected to achieve the goals of the BPM to be replaced.

It is felt that establishment of a Watch Dog Group would be far more effective as a deterrent to illegal dumping into catch basins than a stenciled catch basin saying “Don’t Dump”.